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17 UBER TECHNOLOGIES, INC.  
and OTTOMOTTO LLC

18 UNITED STATES DISTRICT COURT  
19  
20 NORTHERN DISTRICT OF CALIFORNIA  
21  
22 SAN FRANCISCO DIVISION

22 WAYMO LLC,  
23  
24 Plaintiff,  
25  
26 v.  
27 UBER TECHNOLOGIES, INC.,  
28 OTTOMOTTO LLC; OTTO TRUCKING LLC,  
Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF MICHELLE  
YANG IN SUPPORT OF  
PLAINTIFF'S ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL  
DECLARATION OF LAMBERTUS  
HESSELINK IN SUPPORT OF  
WAYMO'S STATEMENT (DKT.  
1456)**

Trial Date: October 10, 2017

1 I, Michelle Yang, declare as follows:

2 1. I am an attorney at the law firm of Morrison & Foerster LLP. I make this  
3 declaration based upon matters within my own personal knowledge and if called as a witness, I  
4 could and would competently testify to the matters set forth herein. I make this declaration in  
5 support of Plaintiff's Administrative Motion to File Under Seal Declaration of Lambertus  
6 Hesselink in Support of Waymo's Statement (Dkt. 1456).

7 2. I have reviewed the following documents and confirmed that only the portions  
8 identified below merit sealing:

Document	Portions to Be Filed Under Seal
Declaration of Lambertus Hesselink	Entire Document

9  
10  
11  
12 3. The entirety of the Declaration of Lambertus Hesselink contains highly  
13 confidential technical information and diagrams illustrating such information of Uber's LiDAR  
14 sensors. This highly confidential information is not publicly known, and its confidentiality is  
15 strictly maintained. I understand that disclosure of this information would allow Uber's  
16 competitors to gain detailed knowledge into the technical specifications of Uber's LiDAR sensors  
17 and use this knowledge to tailor their own LiDAR development, such that Uber's competitive  
18 standing could be significantly harmed.

19 4. Defendants' request to seal is narrowly tailored to those portions of the  
20 Declaration of Lambertus Hesselink that merits sealing.

21 I declare under penalty of perjury under the laws of the United States that the foregoing is  
22 true and correct. Executed this 11th day of September, 2017, in Washington, D.C.

23  
24 /s/ Michelle Yang

25 Michelle Yang

**ATTESTATION OF E-FILED SIGNATURE**

I, Arturo J. González, am the ECF User whose ID and password are being used to file this Declaration. In compliance with General Order 45, X.B., I hereby attest that Michelle Yang has concurred in this filing.

Dated: September 11, 2017

/s/ Arturo J. González  
Arturo J. González